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January 12, 2024

Hon. Edgardo Ramos  
U.S. District Court Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

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## MEMO ENDORSED

**Re: *Bell Semiconductor, LLC v. Broadcom Corporation et al.* – Case No. 24-cv-00156**

Dear Judge Ramos:

We represent Defendants Broadcom Corporation and Avago Technologies General IP Singapore (PTE) LTD. (“Defendants”) in the above-captioned matter. Pursuant to Local Rule 7.1(d) and Your Honor’s Individual Rule 1.E., we are writing to request that Defendants’ time to answer, move against, or otherwise respond to Plaintiff’s Complaint be extended. Defendants currently have until January 16, 2024 to answer, move against, or otherwise respond to the Complaint.

Defendants hereby respectfully request that the Court extend its time to file its answer or other response to the Complaint to March 7, 2024. Defendants requests this additional time to further investigate and adequately respond to the Complaint.

Defendants have not previously requested an extension and counsel for Plaintiff consents to the requested extension,<sup>1</sup> which does not affect any other scheduled case deadlines.

We thank the Court for all courtesies shown in this matter.

Respectfully submitted,


/s/ *Emily B. Cooper*

Emily B. Cooper

Service via email and overnight mail to:

Adam Rodriguez (Arodriguez@bpslaw.com)  
David Chen (DChen@bpslaw.com)  
Lowell Jacobson (LJacobson@devlinlawfirm.com)

Defendants' request for an extension of time to respond to the complaint, until March 7, 2024, is granted. Defendants' are directed to serve a copy of this order to Plaintiff. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: 1/16/24  
New York, New York

<sup>1</sup> Plaintiff agreed to extend Defendants’ time to respond to the Complaint until March 7, 2024 before this action was removed to Federal Court, and also agreed that that extension would continue to apply upon removal. *See* Stipulation Extending Time to Respond to the Complaint in *Bell Semiconductor, LLC v. Broadcom Corp. et al.*, Index No. 655950/2023 (N.Y. Sup. Ct. N.Y. Cty. Jan. 4, 2024) (NYSCEF Doc. No. 18). Defendants also provided a copy of this letter to Plaintiff on January 12, 2024, but Defendants did not immediately respond to consent to the filing this letter.